

Plaintiffs' Expert Errata—July through September 2008

Plaintiffs' Expert & Subject	Date(s) of Errata	Volume and Nature of Errata	Related Information
Cooke, G.D (Eutrophication of Lake Tenkiller)	August 1	4 pages (new revised tables, increases “period of record” analyzed for trihalomethane (THM) and haloacetic acid (HAA5) violations at several utilities and locations)	States that Dr. Engel’s errata “has no effect on our Report” but submitted a second errata based on changes in Dr. Wells’ second errata, which was in turn based on Dr. Engel’s errata
	Sept. 30 (dated Sept. 26)	2 pages (appears to change trophic state conclusions)	
Engel, Bernard (Fate & Transport)	September 4	49 pages (new data, new model, changes in results for phosphorus loads during the 1997-2006 base period and for all scenarios, both historical and future, and changes in virtually all numbers in original report)	Errata revealed original report had been based on “erroneous data” because of miscommunication between Dr. Engel and his assistant Had cascade effect on reports of Drs. Wells, Stevenson, Cooke, and Welch Provided additional considered materials following service of errata
Fisher, J. Berton (Fate & Transport)	September 3	3 pages (rewriting Opinion 18)	Errata presented at and after deposition
	September 18	33 pages (changes in ratios supporting Opinion 18 and adjustments in many concentrations used in various ratio analysis to reflect “dry weight” concentrations rather than “wet weight” concentrations)	

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Johnson, Gordon (Land Application of Litter as "Disposal" in the IRW)	August 18	New depletion model, with multiple spreadsheets and thousands of data points	Emailed new phosphorus depletion model the day before his deposition Acknowledged in deposition that he had the data for the new model before he issued his original report, and that he had completed the new model more than a month before he delivered it
Olsen, Roger (Integrating Expert; Fate & Transport)	July 25 Sept. 30 (dated Sept. 24)	11 pages (changes in report on Plaintiffs' sampling program and PCA fingerprint analysis, including new sections of text and replacement of several tables and charts) 16 pages (notes several areas of revision, including spreadsheet regarding USGS highflow data)	Acknowledges that in first errata, "[s]ix sentences were added to correct omissions that resulted in an incomplete explanation of my waste comparison methods"
Stevenson, Jan (Integrating Expert; Fate & Transport)	August 5 Sept. 30 (dated Sept. 26)	50 pages (increases phosphorus concentrations in several scenarios, reverses relative total P concentrations in two scenarios) 12 pages (alters percent changes for several scenarios from first errata)	Errata change method used to reach conclusions from linear regression method in original report to method using long-term averages of total phosphorus (TP) concentrations, admitting that he "mistakenly used the regression analysis"

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Welch, E.B. (Ecological Health of Lake Tenkiller)	July 25 August 13	2 pages (appear to be minor changes) 7 pages (new Appendix D, trophic state data for 18 additional dates in years 2001-2004)	Acknowledges that errata include conclusions based on statistical analyses performed by Mr. King and Dr. Loftus “performed after I completed my report” and that “[t]he discussion of this work was prompted by counsel’s questions during my deposition”
Wells, Scott (Water Quality and Hydrodynamic Modeling of Tenkiller Reservoir)	August 26 Sept. 30 (dated Sept. 22)	118 pages (at least seven modeling runs, 157 revised figures and 17 revised tables reflecting these changes, involving tens of thousands of underlying data points 122 pages (makes no distinction between report, new changes, and first errata changes; significantly modifies report due to variations in model output between first and second errata.)	Acknowledges that revised model simulations in second errata “resulted in somewhat more noticeable changes in the modeling results” Acknowledges that second errata uses USGS chlorophyll <i>a</i> field data “inadvertently omitted” from the boundary conditions for Lake Tenkiller for the six 50-year scenarios previously presented

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